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 MECREDY, R.C. Rochester Gas & Electric Corp.
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 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Requests relief from ASME Code, Section XI re removal of relief valves from sys during hydrostatic test & hydrostatic testing of relief valves Section XI, Div I.

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April 14, 1992

U.S. Nuclear Regulatory Commission
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Attn: Allen R. Johnson
Project Directorate I-3
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Subject: Quality Assurance Manual, Appendix B
Incorporation of ASME Section XI Code Case N-495,
Hydrostatic Testing of Relief Valves at
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

The purpose of this letter is to notify the NRC that Rochester Gas and Electric requests relief from the ASME Code, Section XI (see Attachment 1, Relief Request No. 17). We would alternatively use ASME Boiler and Pressure Vessel Code Case N-495 (see Attachment 2) at the R.E. Ginna Nuclear Power Plant during the 1992 Refueling Outage and the remainder of the current Third Interval Inservice Inspection Program. This Code Case pertains to alternative rules for the removal of system relief valves during a system hydrostatic test.

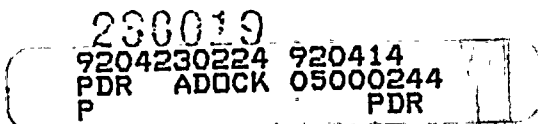
It is our understanding that this Code Case has been incorporated into the draft of the new Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability ASME Section XI Division 1" which has not yet been issued. This Case allows the associated piping (pressure boundary) with the relief valve to be removed during a system hydrostatic test. The relief valve assembly will be tested in accordance with the requirements of a Section XI Subsection IWV test program. At the completion of the system hydrostatic test, the relief valve and associated piping will be reinstalled and inservice leak test performed on the affected mechanical joint(s).

It is requested that upon completion of your review that a reply be provided to Rochester Gas and Electric granting the use of Code Case N-495. Code Case N-495 will also be incorporated in the next revision of the Quality Assurance Manual, Appendix B Program (Inservice Inspection Program) upon your formal notification.

Very truly yours,

Robert C. Mecredy
Robert C. Mecredy

GJW/221



AD 4/17

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
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Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
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Ginna Senior Resident Inspector

ATTACHMENT 1

RELIEF REQUEST NO. 17 REMOVAL OF RELIEF VALVES FROM A SYSTEM DURING HYDROSTATIC TEST

I. Components from which relief is requested:

The removal of relief valves for Class 2 and 3 systems during the Interval Hydrostatic Test (ten year).

II. ASME Requirement from which relief is requested:

In accordance with the footnotes of Tables IWC-2500-1 and IDW-2500-1 no pressure boundary component is exempt during the performance of the interval Hydrostatic Test (ten year). The removal of the relief valves would constitute a violation of this requirement.

Leaving the relief valves in place, would require the installation of a gagging device during the hydrostatic pressure test. From past experience the installation of a gagging device during a pressure test may damage the valve, even if the valve is designed to be gagged.

III. Proposed Alternate Method:

Code Case N-495 give alternate rules and exempts relief valves from the interval Hydrostatic Test as part of the test boundary.

The relief valve can be removed and it's connection points sealed for the test. The alternate rules impose the following requirements:

1. The functional testing program for the relief valves meets the requirements of ASME Section IX, Subsection IWV.
2. Upon reinstallation of the relief valve after the pressure test the valve connection points are tested in accordance with IWC-5221 and IWD-5221.

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Attachment 2

Hydrostatic Testing of Relief Valves Section XI, Division 1

Inquiry: What alternative rules to those stated in Section XI, Division 1, IWC-5222, and IWD-5223 may be used when a relief valve is removed and is not subjected to a system hydrostatic test?

Reply: It is the opinion of the Committee that, as an alternative to the requirements of Section XI, Division 1, IWC-5222, and IWD-5223, a relief valve may be removed and not subjected to a system hydrostatic test when the following requirements are met.

(a) The relief valve functional testing meets the requirements of Subsection IWV.

(b) When the relief valve is reinstalled, a system inservice pressure test is performed on the mechanical joint in accordance with IWC-5221 or IWD-5221, as applicable.